

# Coventry Local Plan Review

## Regulation 19

### Proposed Submission (Publication) Stage Representation Form

(guidance note below)

Ref:

(For official use only)

Name of the Plan  
to which this  
representation  
relates:

**Coventry Local Plan Review – Regulation 19 Proposed  
Submission (Publication)**

**Please return to Coventry City Council in writing or electronically by 23:59 03 March 2025** email to [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk), via our consultation portal <https://coventrycitycouncil.inconsult.uk/system/home> or by post to Planning Policy Team, PO Box 7097, Coventry, CV6 9SL

Please refer to the following data protection/privacy notice:  
[www.coventry.gov.uk/planningpolicyprivacynotice](http://www.coventry.gov.uk/planningpolicyprivacynotice)

Please also note that that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and the Programme Officer. and that your representation(s) will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Coventry City Councils website (personal details will be redacted in line with the Privacy Notice).

This form has two parts:

**Part A** – Personal Details: need only be completed once.

**Part B** – Your representation(s).

**Please fill in a separate sheet for each representation you wish to make.**

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## Part A

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### 1. Personal Details\*

### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

Mr

First Name

Michael

Last Name

Burrow

Job Title

Planning Director

(where relevant)

Organisation

Crest Nicholson

Savills (UK) Ltd

(where relevant)

Address Line 1

55 Colmore Row

Line 2

Birmingham

Line 3

Line 4

Post Code

B3 2AA

Telephone Number

E-mail Address

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## Part B – Please use a separate sheet for each representation

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Name or Organisation:

3. To which part of the Local Plan Review does this representation relate?

Paragraph  Policy

4. Do you consider the Local Plan Review is:

|   |     |                      |    |   |
|---|-----|----------------------|----|---|
| (1) Legally compliant                       | Yes | <input type="text"/> | No | <input type="text"/>                      |
| (2) Sound                                   | Yes | <input type="text"/> | No | <input checked="" type="text" value="X"/> |
| (3) Complies with the<br>Duty to co-operate | Yes | <input type="text"/> | No | <input type="text"/>                      |

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

Proposed Policy DS1 states that a minimum of 29,100 homes will be planned for over the Local Plan period 2021-2041. This is consistent with the housing need identified within the 2022 Coventry and Warwickshire HEDNA (as reviewed through the subsequently commissioned Review of Coventry's Housing Need, published in June 2024).

It is also noted that Coventry City Council will have concluded its consultation on the Regulation 19 stage Local Plan before 12<sup>th</sup> March 2025 and is thereby eligible to proceed to Examination against the provisions set out within the December 2023 NPPF. The December 2023 version of the NPPF allowed: "*exceptional circumstances*" to be used to justify a deviation from the use of the standard method as the basis of calculating housing need.

**Nevertheless** even if the use of the HEDNA figures as the basis for the Coventry housing need is deemed to constitute exceptional circumstances, paragraph 67 of the December 2023 NPPF still identifies that growth ambitions linked to economic development or infrastructure investment can result in the identified housing requirement being planned for in a Local Plan being higher than the identified housing need. NPPF paragraph 60 also introduces the opportunity to also give consideration to the importance being placed on delivery of affordable

housing and the need to ensure that a sufficient variety and amount of land can come forward where it is needed.

The Housing Background Paper (November 2024) highlights the significant need for affordable housing for the Plan period<sup>1</sup>. By contrast the published Authority Monitoring Reports identify that substantially less affordable housing than this identified affordable housing need has been completed on an annual basis since 2011/12 (ranging from 75 dwellings per year to 392 dwellings per year). This would provide a clear justification to plan for the delivery of more than the base housing need position in order to enable the delivery of more affordable homes.

It should also be recognised that some allocated sites and sites with planning permission will take longer to be developed than expected and some allocated / committed sites may even not be constructed during the Plan period. In order to ensure that the Local Plan is effective, justified and consistent with national planning policy it is accordingly important for the Local Plan to allow for an additional 'buffer' in setting the housing requirement for the Plan period to ensure that there is sufficient variety in the size and number of housing sites allocated and delivered to enable the Coventry housing need to be met and to facilitate the delivery of additional affordable housing.

In this regard Crest Nicholson considers that the Coventry Local Plan should be seeking to meet a higher housing target than its minimum housing need.

6. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Crest Nicholson considers that the Coventry Local Plan should be seeking to meet a higher housing target than its minimum housing need in order to: ensure that there is sufficient variety in the size and number of housing sites allocated and delivered; enable the Coventry housing need to be met; to facilitate the delivery of additional affordable housing; and accord with the requirements of NPPF paragraphs 60 and 67.

***Please note:*** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.***

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<sup>1</sup> Net annual additional need of 941 social / affordable rented homes and 149 affordable ownership homes.

7. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

Please add any further comments relating to the SA report in the box below

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☒

**Yes**, I wish to participate in hearing session(s)

**Please note** that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Crest Nicholson has an interest in land located immediately to the South of the Coventry administrative boundary which is allocated in the adopted Warwick District Local Plan (Policy H42) for the delivery of housing to assist with meeting unmet Coventry housing need. Consideration of the quantum of the Coventry City housing target and the deliverability of the Coventry City housing land supply can directly influence whether allocations might be needed within adjacent LPA areas to meet the Coventry housing target.

Crest Nicholson has already obtained planning permission for 425 dwellings within this allocation which is under construction and is still actively promoting the residual land in this allocation for housing development, supported by adjacent land which can deliver biodiversity benefits, through the emerging South Warwickshire Local Plan.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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## Part B – Please use a separate sheet for each representation

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Name or Organisation:

1. To which part of the Local Plan Review does this representation relate?

Paragraph  Policy

2. Do you consider the Local Plan Review is:

|   |     |                      |    |   |
|---|-----|----------------------|----|---|
| (1) Legally compliant                       | Yes | <input type="text"/> | No | <input type="text"/>                      |
| (2) Sound                                   | Yes | <input type="text"/> | No | <input checked="" type="text" value="X"/> |
| (3) Complies with the<br>Duty to co-operate | Yes | <input type="text"/> | No | <input type="text"/>                      |

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Regulation 19 consultation document (paragraph 3.9) proposes that the Coventry City housing need will be met in full within the Coventry City administrative boundary through an urban and brownfield-focused strategy of allocations and densification.

It is recognised that the proposed approach to housing delivery in Policy DS2 is supported by the NPPF, which encourages (including at paragraphs 8, 11, 62 and in chapter 11) making effective use of land and optimising densities.

**Nevertheless** the NPPF (including at paragraphs 16, 35 and 75) stresses that Local Plans need to be deliverable. This deliverability applies to the housing sites upon which the Local Plan is reliant in order to meet the housing target. Crest Nicholson has a concern that not all of the sites within the Coventry City administrative area which Coventry City Council is relying on to meet the housing target (as identified within the HELAA) will be deliverable within the Plan period.

As identified within the response to proposed Policy DS1 some allocated sites and sites with planning permission will take longer to be developed than expected and some allocated / committed sites may even not be constructed during the Plan period. In order to ensure that the Local Plan is effective, justified and consistent with national planning policy it is accordingly important for the Local

Plan to allow for an additional 'buffer' in setting the housing requirement for the Plan period to ensure that there is sufficient variety in the size and number of housing sites allocated and delivered to enable the Coventry housing need to be met and to facilitate the delivery of additional affordable housing. In this regard Crest Nicholson considers that the Coventry Local Plan should be seeking to meet a higher housing target than its minimum housing need.

The NPPF advocates cross-boundary working (including at paragraphs 21, 24, 27 and 35) and the role that strategic policies play in addressing this. Given the constraint to further expansion provided by the Coventry City administrative boundary the Local Plan, Policy DS2 should accordingly be actively recognising the need to meet some of its housing target on a cross-boundary basis within neighbouring LPA areas, including within Warwick District.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy DS2 should be specifically and clearly recognising the need to meet some of its (increased) housing target on a cross-boundary basis within neighbouring LPA areas, including within Warwick District.

It is noted that the proposed Strategic Policy GB2 recognises the contribution that land to the south of Westwood Heath Road, which is currently safeguarded for development in the future, could make to the housing land supply if required. Crest Nicholson considers that similar recognition should be given to the contribution to the housing land supply that can be provided by land to the south of Westwood Heath Road in Warwick District which has already been removed from the Green Belt to assist with meeting a Coventry City housing requirement.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Paragraph

Please add any further comments relating to the SA report in the box below

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